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AT-LARGE ADVISORY COMMITTEE
ALAC Statement on Initial Report of the Technical Study Group on gTLD
Integrations with Alternative Naming Systems

Preamble

On 10 August 2026, the Public Comment proceeding opened for the Initial Report of the Technical Study Group (TSG) on gTLD Integrations with Alternative Naming Systems. An At-Large workspace was created in preparation for this Public Comment submission. The At-Large Consolidated Policy Working Group reviewed the Initial Report of the TSG on gTLD Integrations with Alternative Naming Systems and decided it would be in the interest of end user communities to develop and submit an ALAC Public Comment Statement.

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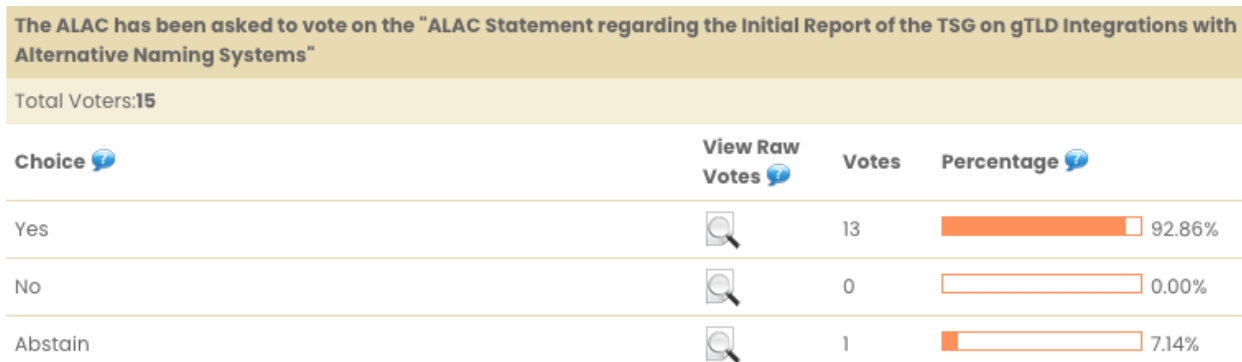
Ratification Record

On 10 August 2026, the Public Comment proceeding opened for the Initial Report of the TSG on gTLD Integrations with Alternative Naming Systems. On 02 September 2026, the Consolidated Policy Working Group (CPWG) discussed the comments for an ALAC statement. The CPWG decided it would be in the interest of end-user communities to develop and submit an ALAC statement for this public comment proceeding. Satish Babu, Hadia Elminiawi, Murray McKercher, and Tinuade Oguntuyi volunteered to draft the initial ALAC statement for CPWG consideration and ALAC endorsement.

On 09 September 2026, a draft statement was shared with the CPWG for review and input. This draft statement was discussed on 09 September 2026. On 16 September 2026, the draft ALAC

statement was finalized. The ALAC Chair, Jonathan Zuck, requested that the statement be ratified by the ALAC before submission to the ICANN Public Comment feature.

On 21 September 2026, staff confirmed the online vote resulted in the ALAC endorsing the statement with 13 out of 15 votes in favor. 0 votes against, and 1 abstention. Please note [100]% of ALAC members participated in the poll. The ALAC members who participated in the poll are (alphabetical order by first name): Adebunmi Akinbo, Aftab Siddiqui, Aziz Hilali, Claire Craig, Eunice Alejandra Perez Coello, Emilia Zalewska-Czajczynska, Hannah Frank, Jonathan Zuck, Judith Hellerstein, Justine Chew, Natalie Tercova, Pari Esfandiari, Raihanath Gbadamassi, Satish Babu. You may view the results here:



ALAC and At-Large Community Comments

Background and context

The ALAC and the At-Large community appreciate the opportunity to comment on the Initial Report of the Technical Study Group (TSG) on gTLD Integrations with Alternative Naming Systems ("the Report").

Historically, alternative Internet resource naming systems, or "alt-root" systems, have struggled to gain meaningful traction, largely due to a lack of native browser support, which left them inaccessible to ordinary Internet users outside a small technical community. This landscape has shifted markedly with the rise of blockchain technology, however. Web3-based alt-roots, such as .crypto, .eth, and .nft, have seen a significant revival, made accessible through specialized plug-ins, browser extensions, and a new generation of decentralized, crypto-native browsers.

This revival has raised a concern shared broadly across the ICANN community: the coexistence of multiple, independently operated naming systems, with no inherent mechanism to reconcile them, is fundamentally unsound. It was to examine how these parallel naming environments might be bridged in a consistent, secure, and manageable manner that ICANN commissioned the Technical Study Group.

In its Initial Report, the TSG concludes that such a bridge is achievable only under a "string+controller integration" model, whereby a name may be integrated across the global DNS and an alt-naming system only if the same string is used, and controlled by the same party, in

both. The Report presents this as a technical precondition for safe integration, rather than as a recommendation on whether such integration should be permitted as a matter of policy.

Overall Position

The ALAC does not oppose further exploration of a "string+controller integration" model connecting the global DNS with alternative naming systems. However, the ALAC is concerned that the Report, prepared to satisfy a narrow Registry Services Evaluation Policy (RSEP) security-and-stability review, leaves unresolved a number of questions with direct consequences for end-users. The ALAC recommends that these questions be addressed through full GNSO policy development before any registry service application under this model is approved, rather than through a technical sign-off alone.

End-User Concerns

The ALAC's review of the Report identified the following risks to registrants and Internet users:

- **Confusion from inconsistent resolution.** The same string could resolve to different controllers in the DNS versus an alt-naming system, with no visible indication to the ordinary user that this has occurred.
- **Erosion of end-user trust.** Left unaddressed, this kind of confusion risks eroding trust in the Domain Name System as a whole.
- **Weaker recourse.** The Report does not establish that UDRP and URS, or an equivalent, would function for names that exist only in an alt-naming system.
- **Reduced contactability.** "Thin" registries combined with blockchain pseudonymity may make registrants harder to identify than under the current DNS, weakening abuse response and law enforcement cooperation.
- **Suspension delays.** Where an alt-naming system relies on decentralized governance (e.g., DAO votes), enforcing a required suspension may take substantially longer than DNS compliance mechanisms allow, letting abusive or court-ordered-takedown names remain active.
- **Undetectable namespace collisions.** Names already registered in an alt-root before any integration may collide with DNS names in ways current detection tooling cannot identify, since they generate no DNS query.
- **Dependence on DNS-query-based abuse infrastructure.** Blocklists and passive-DNS threat intelligence rely on observing DNS query traffic; names resolving entirely outside the DNS may generate none, leaving associated malicious activity largely invisible.
- **A potential force multiplier for abuse.** Decentralized hosting and multiple public gateways may let malicious content persist even once identified, since no single accountable party may be able to remove it, and blocking one access point does not stop others from serving the same content.
- **Impact on existing holders.** Names sold under a promise of "permanent" or "unrevokable" ownership could become suspendable once integrated with the DNS, without the original holder's consent.

Recommendations

The ALAC respectfully recommends that ICANN treat the following as within the Terms of Reference of a GNSO Policy Development Process, rather than relying on the RSEP technical evaluation alone before approving any application under the string+controller integration model:

1. Require applicants to demonstrate a working rights-protection mechanism equivalent to UDRP/URS in the alt-naming system, not merely a stated intention to develop one.
2. Establish a minimum verifiable contact-information standard for registrants of integrated names.
3. Require a defined maximum suspension-synchronization delay, with applicants demonstrating their governance process can meet it.
4. Require a consent or transition mechanism for holders of names already sold under different terms prior to any integration.
5. Require applicants to demonstrate continuous compliance monitoring, with measurable controls for detecting string drift, controller drift, synchronization failure, unauthorized changes, and data inconsistency, together with reporting and remediation obligations.

The ALAC further recommends that ICANN give explicit preference to the integration model described in the Report as extending the Shared Registration System (SRS) itself, adding alternative naming systems as "plugins" so the SRS populates both the DNS and alt-naming systems. The Report characterizes this as the most straightforward integration mode, and the ALAC agrees, but on end user and consumer-protection grounds rather than technical simplicity alone: this approach brings the alt-naming system under existing ICANN policy, directly addressing the ALAC's contactability concern by ensuring registrant data is collected, and avoiding the ambiguity of "string+controller" models based purely on cryptographic proof of control (e.g., tokens) with no associated registrant record, an ambiguity the Report itself acknowledges may leave existing consumer-protection policies unable to function.

Separately, and independent of any policy development process, the ALAC recommends that ICANN requests the Security and Stability Advisory Committee (SSAC) to assess the collision-detection gap for pre-existing alt-root registrations specifically, as this technical matter can and should be examined without awaiting broader policy deliberation.

The ALAC also notes, for context, that members of the TSG include representatives of organizations with a direct commercial interest in the outcome of this evaluation. The ALAC raises this as a transparency observation rather than its primary concern, and encourages ICANN to publish any conflict-of-interest safeguards that applied to the TSG's work.

Conclusion

The ALAC appreciates the opportunity to comment and looks forward to continued engagement with ICANN org, SSAC, and the GNSO on this matter as it develops.